



Filed via ECFS

March 7, 2016

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554
Attn: Wireline Competition Bureau

Re: Connect America Fund, WC Docket No. 10-90

Dear Ms. Dortch,

Mark Twain Telephone Rural Company ("Mark Twain" or the "Company"), Study Area Code 421914, hereby notifies the Federal Communications Commission ("FCC" or "Commission") and the Wireline Competition Bureau ("WCB" or "Bureau") of an issue that has come to light as Mark Twain has been analyzing its Alternative Connect America Model ("A-CAM") illustrative results. Mark Twain wishes to make this clarification on the record, prior to the forthcoming release of the Order mandating that rate of return carriers make a choice between the voluntary A-CAM or the modified rate of return Universal Service Fund ("USF") support.

Mark Twain has found a section of its study area comprised of 16 census blocks where the Missouri RSA No. 5 Partnership is listed as a competitor providing fixed wireless serves in these blocks. Mark Twain contends that Missouri RSA No. 5 **does not** provide service as an unsubsidized fixed wireless competitor in the Mark Twain study area. Representatives from Mark Twain have held discussions with representatives of the ILEC affiliate of Missouri RSA No. 5, Chariton Valley Telephone Company on this matter. Chariton Valley agrees that Missouri RSA No. 5 does not provided service in Mark Twain's study area. Furthermore, Missouri RSA No. 5 receives high cost USF support, so regardless of where it serves, it should not be considered an "unsubsidized competitor" and it should not be able to "knock out" Mark Twain from A-CAM funding in those 16 census blocks.

Mark Twain respectfully requests that the FCC accommodate this information in the final version of the A-CAM, and that Mark Twain not be subject to the competitive knock out policy where Missouri RSA No. 5 is concerned. Not only does Missouri RSA No. 5 not provide service in Mark Twain's study area, but Missouri RSA No. 5 cannot be considered

A n I n d e p e n d e n t T e l e p h o n e C o o p e r a t i v e

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an "unsubsidized competitor." Mark Twain requests that the FCC correct this information. Without these corrections, the Commission's universal service policy for the Mark Twain study area will be frustrated as the amount of support available will not be sufficient to advance broadband technology in the area.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jim Lyon".

Jim Lyon
Executive Vice President & General Manager
Mark Twain Rural Telephone Company